

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

Division

CIV-22-317-PRW

Case No.

(to be filled in by the Clerk's Office)

Miguel Adrian Adams

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The GEO Group Inc
Mark Bowen (Warden)

Medical Administration Honick Kaer

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

"Jury Trial Requested"**FILED**

APR 15 2022

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT. WESTERN DIST. OKLA.
BY SD DEPUTY

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Miguel Adrian Adams
 All other names by which
 you have been known: Miguel Adrian Petties
 ID Number 270179
 Current Institution Oklahoma State Penitentiary
 Address D-2-97
McAlister OK 74502
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name The GEO Group Inc
 Job or Title (*if known*) Owner
 Shield Number _____
 Employer LCRF Lawton Correctional Rehabilitation Facility
 Address 8607 SE Flower Mound Rd
Lawton OK 73501
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name Mark Bowen
 Job or Title (*if known*) Warden
 Shield Number _____
 Employer LCRF Lawton Correctional Rehabilitation Facility
 Address 8607 SE Flower Mound Rd
Lawton OK 73501
City State Zip Code
☒ Individual capacity ☒ Official capacity

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Defendant No. 3

Name

Smith

Job or Title (if known)

Nurse

Shield Number

Employer

Lawton Correctional Rehabilitation Facility

Address

8607 SE Flower Mound Rd

Lawton

OK

73501

City

State

Zip Code

☒ Individual capacity☒ Official capacity

Defendant No. 4

Name

Achidi

Job or Title (if known)

Nurse

Shield Number

Employer

Lawton Correctional Rehabilitation Facility

Address

8607 SE Flower Mound Rd

Lawton

OK

73501

City

State

Zip Code

☒ Individual capacity☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1st, 5th, 8th, and 14th Amendment Rights.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See Attachments D. Jurisdiction

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

See Attachment Statement of Claim

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

See Attachment Statement of Claim

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C. What date and approximate time did the events giving rise to your claim(s) occur?

on 4-26-21 and 7-27-21

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

The Plaintiff was left in his cell to suffer in pain and in which could have lead to death on 4-26-21 and on 7-27-21 the Plaintiff was refused medical attention and left in his cell to suffer in pain with infected intestine that could have been fatal Nurse Achidi, Nurse Smith, my cellmate Aaron Marks and Plaintiff's mom Helen Petties she talked to Plaintiff's case manager

V. Injuries and Chief of security Ms. Hood.

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Plaintiff is set to have surgery do to the neglect.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See Attachment E Request For Relief

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VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Lawton Correctional Rehabilitation Facility

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)?

Part of my claim I was sent to hospital and talked with a Surgeon per grievance I appealed to medical ARA

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- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

Lawton Correctional Rehabilitation Facility

2. What did you claim in your grievance?

To be sent to the hospital to have surgery done

3. What was the result, if any?

denied relief

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I appeal to Medical ARA in Oklahoma department of correction Headquarters Yes, was sent to hospital and scheduled for surgery.

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F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

N/A No Response on Nourse Smith Request To Staff

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

N/A Medical Administration on 8-2-21 No Response

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

N/A Filed Request To STAFF Exhibit H
(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

N/A

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- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Miguel Adrian Adams

Defendant(s) The GEO Group Inc. et al.

2. Court (if federal court, name the district; if state court, name the county and State)

Western District

3. Docket or index number

CIV-21-297-D

4. Name of Judge assigned to your case

Timothy D. DeGiusti

5. Approximate date of filing lawsuit

2021

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition.

3-25-22

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Dismissed Without Prejudice

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

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☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Miguel Adams

Defendant(s) Rick Witten, Everett Shea, Michal Eccles, Kelsey Knight

2. Court (if federal court, name the district; if state court, name the county and State)

Western District Court

3. Docket or index number

CV-20-1175-D

4. Name of Judge assigned to your case

Gary M. Purcell

5. Approximate date of filing lawsuit

2020

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition

6-8-21

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Denied Without Prejudice.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)**IX. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4-9-21

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Michael A. Adams
Michael A. Adams
270179
D-2-36 P.O. Box 97
McAlister OK 74502
City State Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Pro-Se

City State Zip Code

Telephone Number

E-mail Address

Defendants

Nurse Achidi

Nurse Smith

Defendant No 5.

Name / Sto Honickner

Job or title Medical Administrator

Employer Lawton Correctional Rehabilitation Facility

Address 8607 SE Flower Mound Rd.

Lawton

OK

73501

city

state

zip code

☒ Individual capacity

☒ official capacity

D. Jurisdiction

Defendant The GEO Group Inc acted under color of state law, authority, and under color of the ~~statutes~~ statutes, ordinances, Regulations, customs, and usage of the state of Oklahoma. 57 O.S. 1996, § 561.

Defendant Mark Bowen (Warden) acted under color of state law, authority, and under color of the statutes, ordinances, Regulations, customs, and usage of the state of Oklahoma. 57 O.S. 1996, § 561.

Defendant Henicker Medical Administration acted under color of state law, authority, and under color of the statutes, ordinances, Regulations, customs, and usage of the state of Oklahoma. 57 O.S. 1996, § 561.

Defendant Ms. Smith (Nurse) acted under color of state law, authority, and under color of the statutes, ordinances, Regulations, customs, and usage of the state of Oklahoma. 57 O.S. 1996, § 561.

Defendant Ms. Achidi (Nurse) acted under color of state law authority, and under color of the statutes, ordinances, Regulations, customs, and usage of the state of Oklahoma. 57 O.S. 1996, § 561.

Jurisdiction is invoke pursuant to 28 U.S.C. §. 1343 (3); 42 U.S.C. § 1983 This action arises under the United States Constitution Amend's First, Fifth, Eighth, and the Fourteenth Amendments. Procedures Due Process, and Equal Secured Rights, and state

Created Rights arising from conditions of Plaintiff medical history being neglected.

" A Pro se litigant's pleading are to be construed liberally, and held to a less stringent standard than formal pleadings Drafted by laws" Citing Haines v. Kerner, 404 U.S. at 502-21, 92 S. Ct. 594, 30 L. Ed. 2d 652 (1972).

Venue: Venue is proper in the U.S. Western District of Oklahoma Pursants to title 12 O.S. section 141 which sets venue "[I]n any county of Oklahoma, where service of summons can be obtained upon one or more of the Defendants

Count I. Standard of Review Cause and Claim

Statement of Claim (A)

The Plaintiff Miguel Adrian Adams #270179 was housed at Lawton Correctional Facility on January 5th 2021. When the Plaintiff arrived at said facility he was orientated by a medical staff member in which at the time the Plaintiff advised the nurse that he has chronic Diverticulitis and that he is on a special diet due to his medical condition he's unable to eat certain foods. While housed at said facility the Plaintiff was rushed to the hospital for severe stomach pain in which is a result from Diverticulitis.

The Plaintiff was taken to Comanche County Hospital and seen by the emergency room doctor and was told that the severe pain that he is in is do to the Diverticulitis flaring up and told the Plaintiff that if it happens again they was going to refer the Plaintiff to the surgeon. The emergency room doctor also advised the Plaintiff that she was going to put in the medical notes that if offender/patient has severe stomach pain send him back to the emergency room immediately.

Lawton Correctional Rehabilitation Facility medical staff has failed to follow the doctors orderse as well as failed to do protocol on the Plaintiff in which is take the Plaintiff's vitals and temperature which will show that the Plaintiff is in severe pain and by checking the Plaintiff's temperature if the Plaintiff is running a temperature it could means and a sign that the Plaintiff could have a leak in his intestines and that ~~bowt~~ waste is getting into his blood stream in which could lead to death. The Plaintiff has sent numerous sick slips and never been seen and had to

suffer in extreme pain numerous times. The Plaintiff's medical condition is not a sick call matter its a emergency sick call matter do to the fact the Plaintiff has Chronic Diverticulitis and could get infected / flurr up in second. The Lawton Correctional Rehabilitation Facility handbook states under emergency sick call "Emergency sick call is to be used when you have a condition that you feel cannot wait until routine sick call. If you have an emergency report the problem to security personnel in your housing areas and they will contact medical. You will be seen by medical if you have an emergency. The inmate handbook was approved by The GEO Group Inc, Medical Administration and Mark Bowen Warden and signed. The Plaintiff has followed the inmate handbook and has been neglect neglected medical attention by the Lawton Correctional Rehabilitation Facility officers and medical nurses the Plaintiff had to endure the pain in which was sever and hope that his intestines wasn't leaking in which could have been fatal. The Plaintiff's medical file / records shows his medical condition in their computers.

The Plaintiff needs surgery, the Plaintiff has filed request to staff and grievance on said issue and requested that he be taken to the hospital to get surgery done or when he is in severe pain could the nurse do protocol the Plaintiff was denied relief by Lawton Correctional Rehabilitation Facility medical administration in which violates his United States Constitutional Rights and shows cruel and unusual punishment. The Plaintiff is in the custody of the

of the Oklahoma Department of Correction basically a ward of the State and since the Plaintiff is in such custody he has the right to proper medical attention / surgery if needed. The Plaintiff has been denied this attention in which he had to suffer in pain numerous times.

Count II, Standard of Review Cause and Claim

Statement of Claims (B)

The GEO Group Inc
Mark Bowen (warden)

The GEO Group Inc and Mark Bowen are to be held responsible for their employees' wrongful actions.

The GEO care is an affiliate of GEO Group and responsible for providing medical care to prisoners incarcerated in GEO Group's facilities. Nurse Achidi, Nurse Smith, Medical Administrator Honickner they are and were employees of the GEO Group and/or GEO care and responsible for providing medical care to prisoners incarcerated in GEO Group's facilities and Mark Bowen (warden) is the overseer of these employees and has purposely neglected the numerous complaints of said Defendants as well as the GEO Group. These Defendants should be held accountable for their neglect of prisoners' rights to have proper medical treatment if needed to deter these Defendants from future neglect of prisoner rights.

Count III. Standard of Review
Cause and Claim

Statement of Claim (C)

Defendant Achidi (nurse)

On or about the 26th day of April year 2021 the Plaintiff Miguel Adrian Adams was requesting medical attention by nurse Achidi the Plaintiff advised her that he was having severe stomach pain and that he has Diverticulitis, Defendant Achidi told the Plaintiff to have the correctional officer Ms. Grier to contact her in 2hrs. if he the Plaintiff is still in pain. The Plaintiff asked Defendant Achidi if she could please check his ~~ter~~ vitals and temperature to make sure he's not running a temperature which in case if he was running a temperature it would show that his intestines are leaking waste into his blood stream and by taking the Plaintiff's vitals would also show he is in extreme pain the Defendant Achidi declined the Plaintiff's request to do proper protocol in which is in the medical records/notes to do protocol on the Plaintiff if complaint about stomach pain. The Defendant Achidi told the Plaintiff "if your not dead in 2hrs have the ~~to~~ to contact her. When the Defendant Achidi came back to the Plaintiff's cell do to the Plaintiff still being in extreme pain had the ~~to~~ call the Defendant Achidi. The Plaintiff asked Defendant Achidi "do he have to die before he receive medical attention Defendant Achidi stated "Yes" and then shrugged her shoulders and started laughing. The Plaintiff's life and health is not being taken serious.

(1C)

The Plaintiff was sentence to due time in the Oklahoma Department of Correction. The Plaintiff was not sentence to death and this Defendant Achidi treated the Plaintiff unprofessional by denying the Plaintiff the proper medical attention the Plaintiff is still suffering with sever stomach pain and was still getting refuse to be taken to the hospital to get surgery while at Lawton Correctional Facility.

The Plaintiff was recorded on video at his cell on the 4th day of April year 2021 in which will show he was in sever pain and was neglected medical attention.

Count IV. Standard of Review

Cause and Claim

Statement of Claim (D)

Defendant Smith (nurse)

On or about the 27th day of July year 2021 morning pill call nurse Defendant Smith came to the Plaintiff's door to give him his medication when the Plaintiff advised the Defendant Smith that he was having severe stomach pain and that he has Diverticulitis.

Defendant Smith asked the Plaintiff if he put in a sick call and the Plaintiff stated "Yes" even though this is a emergency sick call issue. The Plaintiff asked the Defendant if she could please check his vitals and temperature due to the fact he have had his intestines leak bowel into his blood stream. The Defendant Smith stated to the Plaintiff "that she was going to come back in which she never did even after numerous time the ~~%~~ called her. When breakfast arrived ~~the~~ ~~advised~~ ~~%~~ ~~Issac~~ about the Plaintiff advised ~~%~~ Issac about the extreme stomach pain he was still having ~~%~~ Issac called the Sgt. and they escorted the Plaintiff to medical upon arriving at medical Defendant Smith approach the Plaintiff stating he never turned in a sick call slip in which the Plaintiff did then she told the Plaintiff it was nothing she could do for him and that this is not a emergency sick call matter. In which this is due to the fact the Plaintiff's medical illness is life threatening. The Plaintiff told Defendant Smith that he was in extreme pain. The Defendant stated "I can give you some Ibuprofen" The Plaintiff told the Defendant that he was allergic to Ibuprofen and he can't take those" Then the Defendant told the Plaintiff

(1d)

then I will give you some tylenol" The Plaintiff asked the Defendant if she could do protocol on him the Defendant then said she is by talking to him. The Plaintiff stated to the Defendant protocol is taking his vitals and temperature in which the Defendant took the Plaintiff temperature which was 100 showing the Plaintiff was running a temperature and shows signs of his intestines could be leaking or infected when the Defendant tried to do the Plaintiff's vitals the Defendant was asked by the correctional officers if she wanted the cuffs removed due to the fact the Plaintiff's hands was cuffed behind his back the ~~Pl~~ Defendant Smith stated "No" the Defendant couldn't get a read of the Plaintiff's vitals then stated to the Plaintiff "You walked to medical I'm not going to call and wake up the doctor." The Plaintiff stated "he had to walk to medical because you nurse Smith wouldn't come get me" that's when the Defendant Smith told the ~~to~~ they can take the Plaintiff to his unit/cell. The Plaintiff was escorted back to his cell in extreme pain where he couldn't even stand up straight.

Even though the Plaintiff was running a temperature the Defendant Smith refuse to help and call the doctor in which is neglect and cruel and unusual punishment.

Later that morning the Plaintiff was passed out on the floor and his cellmate Aaron Banks got the attention of the ~~to~~ and unit team in which they notified medical with a emergency response. The Plaintiff was rushed back to medical and had his temperature taking and his temperature was around 100 to 104. The Plaintiff was rush and admitted

at Lindsey Hospital where the Plaintiff was told his intestines was infected and was put on IV antibiotics for 6 days in which shows that the Plaintiff was in very bad condition and was told by Dr. Nemri that he was put on schedule to see the surgeon. This Defendant Smith should be held accountable for her poor action that could have been fatal to the Plaintiff.

The Defendant's job was to help offenders that need medical attention and call the doctor on call to let him know the Plaintiff's symptoms and status. This Defendant failed to do so and made the Plaintiff suffer in pain near death and once again the Defendant should be held accountable to defer from future poor decisions. Defendant Smith was terminated / made to resign due to her poor, unprofessional action / neglect to the Plaintiff's medical condition that could have been fatal to the Plaintiff.

"Request For Relief" E. Standard of Review
From Defendant GEO Group Inc: (owners)

- A. In the sum of \$100,000,000 (One-Hundred-million Dollars) for Negligence, for the Plaintiff.
- B. In the sum of \$100,000,000 (One-Hundred-million Dollars) for Compensatory damages, for the Plaintiff.
- C. In the sum of \$100,000,000 (One-Hundred-million Dollars) for the Mental Anguish Damages, for the Plaintiff.
- D. In the sum of \$100,000,000 (One-Hundred million Dollars) for Exemplary, or Punitive damages, for the Plaintiff.

"Request For Relief" Standard of Review
From Mark Bowen (Warden)

- A. In the sum of \$100,000,000 (One-Hundred million Dollars for Negligence, for the Plaintiff.
 - B. In the sum of \$100,000,000 (One-Hundred million Dollars for Compensatory damages, for the Plaintiff.
 - C. In the sum of \$100,000,000 (One-Hundred million Dollars for the mental Anguish Damages, for the Plaintiff.
 - D. In the sum of \$100,000,000 (One-Hundred million Dollars for Exemplary, or Punitive damages, for the Plaintiff.
- (IE)

"Request For Relief" Standard of Review
From Defendant Honickner (Medical Administrator)

- A. In the sum of 100,000,000. (one-Hundred million dollars) for Negligence, for the Plaintiff.
- B. In the sum of 100,000,000. (one-Hundred million dollars) for Compensatory damages, for the Plaintiff.
- C. In the sum of 100,000,000. (one-Hundred million dollars) for the Mental Anguish Damages, for the Plaintiff.
- D. In the sum of 100,000,000. (one-Hundred million dollars) for Exemplary, or Punitive Damages, for the Plaintiff.

"Request For Relief" Standard of Review
From Defendant Achidi (Nurse)

- A. In the sum of 100,000,000. (one-Hundred million Dollars) for Negligence, for the Plaintiff.
- B. In the sum of 100,000,000. (one-Hundred million Dollars) for Compensatory damages, for the Plaintiff.
- C. In the sum of 100,000,000. (one-Hundred million Dollars) for the Mental Anguish damages, for the Plaintiff.
- D. In the sum of 100,000,000. (one-Hundred million dollars) for Exemplary, or Punitive Damages, for the Plaintiff
(2E)

"Request For Relief" Standard of Review From Defendant Smith (nurse)

- A. In the sum of \$100,000,000. (one-Hundred million dollars) For Negligence, for the Plaintiff.
- B. In the sum of \$100,000,000. (one-Hundred million dollars) For Compensatory damages, for the Plaintiff.
- C. In the sum of \$100,000,000. (one-Hundred million dollars) For the Mental Anguish damages, for the Plaintiff.
- D. In the sum of \$100,000,000. (one-Hundred million dollars) For Exemplary, or Punitive damages, for the Plaintiff.

"Request For Relief" "Trial By Jury"

By reason of the gross, willfull, and wanton Negligence of the defendants, and each of them, and by reason of the Deceit, Fraud, Misrepresentation, and bad faith wich the defendants exercised. Plaintiff believes; and therefore alleges he is entitled to "negligence, compensatory damages, mental Anguish damages, and Exemplary or Punitive damages." In the sum of (four-Hundred million dollars) from each Defendant(s): Defendant GEO Group Inc. Defendant Mark Bowen (warden), Defendant Honickner (Medical Administrator) Defendant Achidi (Nurse), Defendant (Smith) nurse.

Wherefore, Plaintiff's Respectfully request this Honorable Judge and

and Honorable Court grant him, the Plaintiff's judgement in an amount in excess of \$2,000,000,000. Two Billion Dollars; with judgement interest, attorney fees, Court costs, all other relief this Honorable Court see appropriate and to deter similar conduct in the future and to show the Defendants, and public that society will not tolerate such actions.

Respectfully Submitted

~~Miguel Adrian Adams #270179~~

Miguel Adrian Adams #270179

Oklahoma State Penitentiary

D-2-36

P.O. Box 97

McAlester, Oklahoma.

74502-0097

Exhibits

- 1). Plaintiff's Request To Staff on Defendant Achidi nurse (Filed) Exhibit A.
- 2). Plaintiff's Request To Staff on Defendant Smith nurse to start grievance process. Plaintiff never recieved a response in which has denied the Plaintiff his right to ~~exhaust~~ fully exhaust his administrative remedies on Defendant Smith nurse (Filed) Exhibit H
- 3). Defendants response to Request To Staff on Defendant Achidi Exhibit A
- 4). ^{Plaintiff's Grievance} ~~Defendants response to~~ (Filed) Exhibit B
- 5). Video recorded on said incident/medical emergency on 4.26.21
- 6). Plaintiff's appeal to Medical ARA Exhibit IC, 2C and E
- 7). Plaintiff's appeal response from Medical ARA Exhibit D and F
- 8). Plaintiff's appeal partial granted by medical ARA Exhibit G
- 9). Defendant(s) retaliation by sending Plaintiff to Oklahoma State Penitentiary when he hasn't been in any trouble.
- 10). ~~Plaintiff filed a request to staff~~